

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

NCS MULTISTAGE INC.

Plaintiff,

vs.

NINE ENERGY SERVICE, INC.

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 6:20-cv-00277-ADA

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE AN  
OPPOSITION TO DEFENDANT’S MOTION TO TRANSFER VENUE**

Plaintiff NCS Multistage Inc. (“NCS”) hereby moves for an extension of time to file an Opposition to Defendant Nine Energy Service, Inc.’s (“Nine Energy”) Motion to Transfer Venue (Dkt. 24).

NCS’s Opposition is currently due August 14, 2020. (Dkt. 20). NCS requests a seven day extension, or an extension through and including August 21, 2020. Nine Energy does not oppose this motion.

The purpose for this request is not delay, but rather to provide NCS with sufficient time to investigate the facts underlying the convenience factors raised in Nine Energy’s Motion to Transfer, including investigating potential party and non-party witnesses, documents, and offices, and to respond to Nine Energy’s arguments. NCS believes that the extension will serve the interests of justice.

For the foregoing reasons, NCS respectfully requests the Court grant this motion and extend the deadline for its response to Defendant’s Motion to Transfer Venue by seven days, or up to and including August 21, 2020.

**Dated: August 5, 2020**

/s/ Domingo M. Llagostera

Domingo M. Llagostera

(Attorney-in-charge)

State Bar No. 24070157

DLLagostera@BlankRome.com

Russell T. Wong (*admitted pro hac vice*)

State Bar No. 21884235

RWong@blankrome.com

Andrew K. Fletcher (*admitted pro hac vice*)

PA State ID. 75544

AFletcher@blankrome.com

Munira Jesani (*admitted pro hac vice*)

State Bar No. 24101967

MJesani@blankrome.com

717 Texas Avenue, Suite 1400

Houston, TX 77002

Tel.: (713) 632-8682

**Attorneys for Plaintiff / Counter-  
Defendant NCS Multistage Inc.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record were electronically served with a copy of the foregoing on August 5, 2020 via the Court's CM/ECF system.

/s/ Domingo M. Llagostera

Doming M. Llagostera